

POOL.com INC.

- and -

INTERNET CORPORATION FOR ASSIGNED NAMES AND NUMBERS

Court File No. 03-CV-24621

Answers to Undertakings Arising from the Cross-examination of Robert Christopher Hall,

on March 15, 2004

Exam No. 04-0236.1

No.	Page, Order or Paragraph	Undertaking and Answer
1.	P. 71, Q. 414-415	<p>To advise if Mr. Hall has any information to contradict the following statement: none of the 37 documents referred to at Exhibit "F" to Mr. Hall's Affidavit were drafted in Ontario.</p> <p><i>Answer: Pool.com Inc. has no knowledge of whether any documents were drafted in Ontario.</i></p>
2.	P. 71, Q. 416-417	<p>To advise if Mr. Hall has any information to contradict the following statement: none of the 37 documents referred to at Exhibit "F" to Mr. Hall's affidavit were prepared or drafted by a resident of Ontario.</p> <p><i>Answer: Pool.com Inc. has no knowledge of whether any documents were drafted by a resident of Ontario.</i></p>
3.	P. 73, Q. 422	<p>To advise if Mr. Hall has any information that any of the 37 documents referred to at Exhibit "F" to his affidavit were not prepared in California. In the event that Mr. Hall disagrees with the statement that the 37 documents were prepared in California, to advise of the basis for the disagreement.</p> <p><i>Answer: The majority of the documents were not drafted by ICANN in California. Document nos. 19, 20, 24, 25 and 33 were prepared by Kevin E. Brannon of the Portland, Oregon offices of Preston Gates Ellis LLP. Document no. 27 was prepared by GoDaddy, Inc. of Scottsdale, Arizona. Document no. 30 was prepared by eNom, Inc. of Bellevue, Washington. Documents nos. 3, 5, 6, 21 and 29 were prepared by VeriSign Global Registry Services or VeriSign, Inc. of Dulles, Virginia. Document no. 36 from Paul Twomey, ICANN to Chuck Gomes, VeriSign confirms VeriSign's Dulles, Virginia address. Dr. Twomey is a resident of Australia. Document nos. 11 and 14 are real-time captioning of</i></p>

No.	Pre-Question	Understanding and Answer
		<p><i>ICANN meetings in Bucharest, Romania. Document no. 35 is a transcript of the testimony of Dr. Paul Twomey before the U.S. Senate Committee on Commerce, Science and Transportation, Subcommittee on Science, Technology and Space in Washington D.C. Pool.com Inc. has no knowledge as to where the remaining documents were drafted.</i></p>
4.	P. 78, Q. 444	<p>To advise whether Mr. Hall disagrees that Claim No. 7 in the registrysite.com litigation is for breach of contract of the Registrar Accreditation Agreement.</p> <p><i>Answer: Claim No. 7 is for declaratory relief against VeriSign for breach of the Registry-Registrar Agreement between each of the plaintiffs and VeriSign. Claim No. 7 is not for breach of the Registrar Accreditation Agreement.</i></p>
5.	479	<p>To advise if Mr. Hall is going to take the position that there are no accredited registrars in California.</p> <p><i>Answer: Pool.com Inc. does not take the position that there are no ICANN accredited registrars in California.</i></p>